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February 23, 2021

**VIA ECF**

Honorable Vernon S. Broderick  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

APPLICATION GRANTED  
SO ORDERED   
VERNON S. BRODERICK  
U.S.D.J. 2/24/2021

Re: Chevrestt v. Pace University, 1:20-cv-<sup>9489</sup>~~03825~~ (VSB)

Dear Judge Broderick:

We represent Plaintiff Angel Chevrestt (“Plaintiff”) in the above-captioned case. We write pursuant to Section 1.G of the Court’s Individual Rules & Practices to respectfully request that the default hearing scheduled for February 25, 2021, at 1:00 p.m. be adjourned *sine die* in light of the parties’ stipulation to vacate the default by defendant Pace University (“Defendant”) [Dkt. #17]. The parties intend to submit a proposed case management plan and scheduling order within 30 days, or at a time to be determined by the Court.

- (1) the original date of the hearing is February 25, 2021 at 1:00 p.m.;
- (2) no previous requests for adjournment or extension have been made;
- (3) no previous requests were granted or denied;
- (4) Counsel for Defendant consents to the requested relief;
- (5) The parties seek an adjournment based on their stipulation to vacate Defendant’s default;

No other dates will be impacted by this request.

Respectfully Submitted,

s/**jameshfreeman**/  
James H. Freeman

*Counsel for Plaintiff*